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8 Attorney for Plaintiff
9 KARTHIK SUBRAMANI

10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

12 KARTHIK SUBRAMANI

13 Plaintiff,

14 v.

15 WELLS FARGO BANK, N.A.,
16 FIDELITY NATIONAL TITLE CO., and
17 DOES 1-100,
18 Inclusive.

19 Defendants

) Case No. Case No. CV 13-1605-SC

)
) **NOTICE OF ERRATA AND**
) **CORRECTION TO PLAINTIFFS'**
) **OPPOSITION TO DEFENDANT'S**
) **MOTION TO DISMISS**

) Date: January 24, 2014

) Time: 10:00 a.m.

) Ctrm: 1 (17th Flr. 450 Golden Gate Ave.,
San Francisco, CA

) Judge: Honorable Samuel Conti

) Trial Date: Not Yet Set

20 **TO ALL INTERESTED PARTIES AND THEIR COUNSEL OF RECORD:**

21 Plaintiff KARTHIK SUBRAMANI through his attorney, Mark Lapham, submits this Notice
22 of Errata and Correction as follows:

23 1. Opposition to Motion to Dismiss at p.3:2 Delete April 25, 2005 and replace with "Wells
24 Fargo."

25 2. Opposition to Motion to Dismiss at p.3:7-8 DELETE sentence "Wells Fargo made no
26 reasonable adjustments nor offered Plaintiff a reasonable loan modification to accommodate this
27 defect."

28 3. Opposition to Motion to Dismiss at p.5:3 INSERT sentence at end of paragraph: In
addition, Plaintiff has offered evidence establishing that no Defendant has a beneficial interest in

1 Plaintiff's DOT or Note because these interests were never effectively assigned to the MBS trust for
2 which HSBC USA, National Association serves as trustee.

3 4. Opposition to Motion to Dismiss at p. 5:18 DELETE "Wells Fargo" and replace with
4 "HSBC, USA, National Association"

5 5. Opposition to Motion to Dismiss at p.9:28; 10:1 Delete "CHASE and".
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7 Dated: January 16, 2014

8 //s/Mark W. Lapham

9 Mark W. Lapham
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